

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

IN RE:)	
)	
JOY MONIQUE MILLER)	Case No. 17-34329-KRH
)	Chapter 13
Debtor)	

**MOTION TO EXPEDITE HEARING ON MOTION
TO INCUR DEBT AND TO SHORTEN NOTICE PERIOD**

COMES NOW the Debtor, by counsel, and moves this Court to Expedite the Hearing on her Motion to Incur Debt and to Shorten Notice Period, and in support thereof states as follows:

1. The Debtor filed this case under Chapter 13 of the U.S. Bankruptcy Code on August 29, 2017.
2. The Debtor has applied for and Credit Acceptance Corporation has approved a loan to the Debtor in the amount of \$14542.90 plus interest at 17.99% per annum to be repaid with a loan term of 57 months and monthly payments of \$382.42 for the purchase of a 2013 Ford Edge or similar vehicle.
3. The Debtor needs to purchase the referenced vehicle as her current vehicle has broken down and she needs a replacement vehicle to travel to and from work and other matters.
4. The purchase of the vehicle is in the best interest of the Debtor and will facilitate her ability to perform under her Chapter 13 Plan filed herein.
5. The Court previously entered an order granting the Debtor's Motion to Incur Debt for a loan with DriveTime. DriveTime has since withdrawn its approval of said loan.

6. The Debtor's Chapter 13 Plan has been confirmed.

WHEREFORE, the Debtor respectfully requests that the Court expedite the hearing on the Motion to Incur Debt, Shorten the Notice Period required for said Motion, grant relief from FRBP 6004(h) stay, and for such other relief as the Court may deem appropriate.

Dated: July 27, 2020

JOY MONIQUE MILLER

By: /s/ James E. Kane
Counsel

James E. Kane (VSB #30081)
KANE & PAPA, P.C.
1313 East Cary Street
Richmond, VA 23219
(804) 225-9500 (phone)
(804) 225-9598 (fax)
Counsel for Debtor

CERTIFICATION

I, James E. Kane, pursuant to Local Rule 9013-1(N), do hereby certify that:

1. I have carefully examined the matter and concluded that there is a true need for an emergency hearing,
2. I have not created the emergency through any lack of due diligence.
3. I have made a *bona fide* effort to resolve the matter without hearing.

By: /s/ James E. Kane
James E. Kane

CERTIFICATE OF SERVICE

I hereby certify that on July 28, 2020, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all parties registered to receive notice thereof and will mail the same by first class mail, postage pre-paid, to the parties on the attached list.

/s/ James E. Kane
Counsel for Debtor

**IN THE UNITED STATES BANKRUPTCY COURT
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IN RE:)	
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)	Chapter 13
Debtor)	

NOTICE OF MOTION AND HEARING

The above Debtor has filed papers with the Court to request an order to Expedite the hearing and to Shorten the Notice Period with respect to the Motion to Incur Debt.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then, you or your attorney must:

- File with the court, at the address shown below, a written request for a hearing [or written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for a hearing (or response) to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above, to:

Clerk of Court
United States Bankruptcy Court
701 East Broad Street
Richmond, VA 23219

You must also mail a copy to:

James E. Kane, Esquire
KANE & PAPA, P.C.
1313 East Cary Street
Richmond, Virginia 23219

- Attend a hearing scheduled for **July 29, 2020 at 12:00 a.m. at U.S. Bankruptcy Court, 701 East Broad Street, Room 5000, Richmond, VA 23219.** If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Dated: July 28, 2020

JOY MONIQUE MILLER

By: /s/ James E. Kane
Counsel

James E. Kane (VSB #30081)
KANE & PAPA, P.C.
1313 East Cary Street
Richmond, VA 23219
(804) 225-9500 (phone)
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/s/ James E. Kane
Counsel for Debtor

Label Matrix for local noticing

0422-3

Case 17-34329-KRH

Eastern District of Virginia

Richmond

Fri Jun 5 15:26:47 EDT 2020

United States Bankruptcy Court

701 East Broad Street

Richmond, VA 23219-1888

Scolopax, LLC

C/O WEINSTEIN & RILEY, PS

2001 WESTERN AVENUE, STE 400

SEATTLE, WA 98121-3132

Acceptance Now

Attn: Bankruptcy

5501 Headquarters Dr

Plano, TX 75024-5837

Wollemi Acquisitions, LLC c/o AIS Portfolio

4515 N Santa Fe Ave. Dept. APS

Oklahoma City, OK 73118-7901

American Medical Collection

PO Box 1235

Elmsford, NY 10523-0935

Ashley Funding Services, LLC its successors

assigns as assignee of Laboratory

Corporation of America Holdings

Resurgent Capital Services

PO Box 10587

Greenville, SC 29603-0587

CAC Financial Corp.

2601 NW Expressway

Oklahoma City, OK 73112-7236

(p)CAPITAL ONE

PO BOX 30285

SALT LAKE CITY UT 84130-0285

Capital One

Attn: Bankruptcy

Po Box 30253

Salt Lake City, UT 84130-0253

Cardiology Associates of Richm

P O Box 740776

Cincinnati, OH 45274-0776

Cardworks/CW Nexus

Attn: Bankruptcy

Po Box 9201

Old Bethpage, NY 11804-9001

Commonwealth of Virginia

Department of Taxation

PO Box 2156

Richmond, VA 23218-2156

(p)CREDIT ADJUSTMENT BOARD INC

8002 DISCOVERY DRIVE

SUITE 311

RICHMOND VA 23229-8601

Credit Collection Services

725 Canton St.

Norwood, MA 02062-2679

Department Stores National Bank

c/o Quantum3 Group LLC

PO Box 657

Kirkland, WA 98083-0657

Fingerhut

6250 Ridgewood Rd

St Cloud, MN 56303-0820

John Randolph Med Ctr

P. O. Box 740760

Cincinnati, OH 45274-0760

John Randolph Medical Center

Resurgent Capital Services

PO Box 1927

Greenville, SC 29602-1927

Labcorp

P.O. Box 2240

Burlington, NC 27216-2240

Laboratory Corporation of Ameri

7311 Boulder View Ln

Richmond, VA 23225-4953

(p)LENDMARK FINANCIAL SERVICES

2118 USHER ST

COVINGTON GA 30014-2434

MERRICK BANK

Resurgent Capital Services

PO Box 10368

Greenville, SC 29603-0368

MIDLAND FUNDING LLC

PO BOX 2011

WARREN, MI 48090-2011

Mr. Holland

Navient

Attn: Bankruptcy

Po Box 9500

Wilkes-Barr, PA 18773-9500

Navient Solutions, LLC. on behalf of

Educational Credit Management Corporatio

PO BOX 16408

St. Paul, MN 55116-0408

Navy Federal Cr Union

Po Box 3000

Merrifield, VA 22119-3000

Navy Federal Cr Union

Po Box 3700

Merrifield, VA 22119-3700

Office of the U. S. Attorney

Suntrust Building

919 East Main Street, Suite 1900

Richmond, VA 23219-4622

Patient First c/o Receivables Management Sys
PO Box 8630
Richmond, VA 23226-0630

(p)PORTFOLIO RECOVERY ASSOCIATES, LLC
PO BOX 41067
NORFOLK VA 23541-1067

Professional Account Services
P.O. Box 188
Brentwood, TN 37024-0188

Quantum3 Group LLC as agent for
MOMA Funding LLC
PO Box 788
Kirkland, WA 98083-0788

Quantum3 Group LLC as agent for
Sadino Funding LLC
PO Box 788
Kirkland, WA 98083-0788

Receivable Management Inc
7206 Hull Street Rd Ste
North Chesterfield, VA 23235-5826

Richard A. Cordle, Treasurer
Chesterfield County
P.O. Box 26585
Richmond, VA 23261-6585

Riverview Physicians for Women
439 Jennick Dr
Colonial Heights, VA 23834-4901

Santander Consumer USA
Po Box 961245
Ft Worth, TX 76161-0244

Scolopax, LLC
c/o Weinstein & Riley, P.S.
2001 Western Ave, Ste 400
Seattle, WA 98121-3132

Sleep Clinics of America Inc
P.O. Box 35690
Richmond, VA 23235-0690

Southside Regional Medical Cen
P O Box 501128
Petersburg, VA 23803-0000

(p)SPRINGLEAF FINANCIAL SERVICES
P O BOX 3251
EVANSVILLE IN 47731-3251

Synchrony Bank/ JC Penneys
Po Box 965007
Orlando, FL 32896-5007

TREASURER CHESTERFIELD COUNTY
P.O BOX 70
CHESTERFIELD, VA 23832-0906

The CBE Group
Payment Processing Center
PO Box 2193
Waterloo, IA 50704-2193

Transworld Systems
Collection Agency
500 Virginia Dr., Suite 514
Fort Washington, PA 19034-2733

US DEPARTMENT OF EDUCATION
CLAIMS FILING UNIT
PO BOX 8973
MADISON, WI 53708-8973

Us Dept Of Ed/Great Lakes Higher Educati
2401 International Lane
Madison, WI 53704-3121

Us Dept Of Ed/Great Lakes Higher Educati
Attn: Bankruptcy
2401 International Lane
Madison, WI 53704-3121

Virginia Department of Tax
P.O. Box 2369
Richmond, VA 23218-2369

Virginia Emergency Group
PO Box 660627
Mailstop: 42643574
Dallas, TX 75266-0827

Visa Dept Store National Bank/Macy's
Attn: Bankruptcy
Po Box 8053
Mason, OH 45040-8053

Wollemi Acquisitions, LLC
AIS Portfolio Services, LP
4515 N Santa Fe Ave. Dept. APS
Oklahoma City, OK 73118-7901

Carl M. Bates
341 Dial 866-813-0912 Code: 8576180
P. O. Box 1819
Richmond, VA 23218-1819

James E. Kane
Kane & Papa, PC
1313 East Cary Street
P.O. Box 508
Richmond, VA 23218-0508

Joy Monique Miller
21200 Hampton Ave.
South Chesterfield, VA 23803-2269

Judy A. Robbins
Office of the U.S. Trustee - Region 4 -R
701 E. Broad Street, Suite 4304
Richmond, VA 23219-1849

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Capital One	Credit Adjustment Board	Lendmark Financial Services
15000 Capital One Dr	8002 DISCOVERY DR RM 311	2118 Usher St
Richmond, VA 23238-0000	Richmond, VA 23229-0000	Covington, GA 30014-0000

Portfolio Recovery Associates	(d)Portfolio Recovery Associates, LLC	Springleaf Financial Services
P.O. Box 12914	POB 41067	3323 South Crater Road
Norfolk, VA 23541-0000	Norfolk VA 23541	Suite A
		Petersburg, VA 23805-0000

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d)Wollemi Acquisitions, LLC, c/o AIS Portfol	(d)Wollemi Acquisitions, LLC, c/o AIS Portfol	End of Label Matrix	
4515 N Santa Fe Ave. Dept. APS	4515 N Santa Fe Ave. Dept. APS	Mailable recipients	57
Oklahoma City, OK 73118-7901	Oklahoma City, OK 73118-7901	Bypassed recipients	2
		Total	59